

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MICHAEL DAVID GREENFIELD
a.k.a. MICHAEL BEN-ARI

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 21-11411 (SCC)

**[PROPOSED] ORDER APPROVING SETTLEMENT AGREEMENTS PURSUANT TO
FED. R. BANKR. P. 9019(a)**

Upon the Motion¹ dated June 1, 2022, of Lior Dagan, in his capacity as the Court-appointed trustee and foreign representative (“Trustee” or “Foreign Representative”) of debtor Michael David Greenfield (“Greenfield,” a.k.a. Michael David Ben-Ari, or the “Debtor”), for entry of an order (this “Order”) under Bankruptcy Rule 9019(a) for approval of a settlement and compromise among the Foreign Representative, Jonathan Greenfield, Elysa Greenfield, each individually and as trustees of the Greenfield Family Trust; and among the Foreign Representative and Alice Ann Greenfield, individually and as the Trustee for the Alice A. Greenfield Family Trust and the Alice A. Greenfield Irrevocable Trust (collectively, the “Settlement Agreements”); and upon the consideration of the Declaration of Roman Peltzman filed concurrently with and in support of the Motion; and this Court having recognized the Foreign Proceeding as a “foreign main proceeding” and Lior Dagan as the Foreign Representative of the Debtor on August 5, 2021; and the Court having jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334; and this Motion being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(P); and this Court having

¹ Capitalized terms not otherwise defined herein shall have the meanings given to them in the Motion.

determined that the relief sought in the Motion is in the best interests of the Debtor, the Debtor's creditors, and all other interested parties; IT IS HEREBY ORDERED THAT:

1. The relief requested in the Motion is hereby granted as set forth herein.
2. The Settlement Agreements are hereby approved pursuant to Bankruptcy Rule 9019(a).
3. Except as otherwise provided in the Settlement Agreements, this Court shall retain jurisdiction with respect to all matters arising out of or relating to the implementation, interpretation and/or enforcement of this Order.

Dated: _____, 2022
New York, New York

HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE